

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

DEFENDANT PAUL J. MANAFORT, JR.'S MOTION FOR LEAVE TO FILE UNDER  
SEAL HIS MOTION FOR RECONSIDERATION OF CONDITIONS OF RELEASE

Defendant Paul J. Manafort, Jr., by and through counsel, hereby moves for leave to file under seal his motion for reconsideration of the conditions of release set forth in the Court's Order dated December 15, 2017. (Dkt. # 95). The Defendant states that despite the general policy that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system, there is good cause and compelling reasons in this instance for the motion for reconsideration to not be disclosed.

More specifically, the Defendant seeks the Court’s reconsideration of certain financial conditions of release that are set forth in the December 15, 2017 Order. To provide the Court with a complete picture of the Defendant’s finances and those of the non-party sureties, and specifically, their ability to satisfy the financial requirements set forth in the Order, an analysis of sensitive financial information is undertaken and focuses on the net asset statements that were previously provided to the Court, and which were previously permitted to be filed under seal. (Dkt. # 65). This information, and the analysis and discussion thereof, is included in the motion for reconsideration for the sole purpose of allowing the Court to perform its proper function – to evaluate the adequacy

and appropriateness of the defendant's conditions of release under 18 U.S.C Section 3142 and determine the least restrictive conditions that will reasonably assure the Defendant's appearance as required. *See United States v. Xulum*, 84 F.3d 441, 443 (D.C. Cir. 1996) (per curiam).

The discussion of the sealed financial statements is included to evaluate the sureties' capacity to make good on their guarantees pursuant to the additional financial requirements set forth in the December 15, 2017 Order. Accordingly, the financial analysis includes a discussion of the private information of the Defendant and non-parties that is not available publicly, including the names of financial institutions where deposits are located and details about the types and amounts of assets and liabilities. The Defendant's previous motion for modification and the Court's Order have sufficiently advised the public, but not created unwarranted risk to the Defendant, his wife and his daughter, regarding their finances. The Court has noted this case is subject to substantial publicity and media coverage, and the identification and analysis of these financial assets and liabilities should continue to be protected.

WHEREFORE, Defendant Manafort moves for leave to file under seal his motion for reconsideration of the conditions of release.

Dated: January 16, 2017

Respectfully submitted,

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